

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE

KENNETH E. SAVAGE, JR.,

PLAINTIFF,

VS.

NO. 2:14-cv-02057-STA-dkv

FEDERAL EXPRESS CORPORATION,
D/B/A FEDEX EXPRESS, FEDEX
CORPORATION EMPLOYEES' PENSION
PLAN, FEDEX CORPORATION RETIREMENT
SAVINGS PLAN,

DEFENDANTS.

DEPOSITION

OF

AMY HUTCHISON

JUNE 2, 2015

TAMMY WENDEL, LCR, CCR
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Beech Bluff, Tennessee 38313
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1 The deposition of AMY HUTCHISON is
2 taken on this, the 2nd day of June, 2015, on
3 behalf of the Plaintiff, pursuant to notice and
4 consent of counsel, beginning at approximately
5 1:57 p.m. at FedEx World Headquarters, 3620
6 Hacks Cross Road, Building B, Memphis,
7 Tennessee.

8 This deposition is taken pursuant to
9 the terms and provisions of the Tennessee Rules
10 of Civil Procedure.

11 All forms and formalities, including
12 the signature of the witness, are waived, and
13 objections alone as to matters of competency,
14 irrelevancy and immateriality of the testimony
15 are reserved to be presented and disposed of at
16 or before the hearing.

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1 A P P E A R A N C E S
2

3 ON BEHALF OF THE PLAINTIFF:

4 JOSEPH NAPILTONIA
5 ATTORNEY AT LAW
6 22515 BANISTER
7 SAN ANTONIO, TEXAS 78259
8 615.336.6882

9 ON BEHALF OF THE DEFENDANTS:

10 DAVID P. KNOX
11 FEDEX EXPRESS
12 SENIOR COUNSEL-LITIGATION
13 3620 HACKS CROSS ROAD
14 BUILDING B, THIRD FLOOR
15 MEMPHIS, TENNESSEE 38125
16 901.434.6286

I N D E X

3 Direct Examination
By Mr. Napiltonia.....5

E X H T R I T S

(NO EXHIBITS MARKED)

20 PAGE
21 COURT REPORTER'S CERTIFICATE..... 22

1 A. Yes.

2 Q. And then after 2014, who calculated
3 it?

4 A. Aon Hewitt.

5 Q. Okay. Where is Aon Hewitt located?

6 A. The office that does the calculations
7 is in Woodlands, Texas.

8 Q. Up in the Houston area?

9 A. Yes.

10 Q. I'm familiar with it. And it's just
11 Aon Hewitt?

12 A. Yes.

13 Q. What relation, if any -- because in
14 the documents that I've been provided by FedEx,
15 I see -- and actually in the discovery, too, it
16 states something to the effect of Mercer by way
17 of or care of the FedEx Retirement Services
18 Center.

19 A. (Witness nods head affirmatively.)

20 Q. What is the FedEx Retirement Services
21 Center as it relates to Mercer?

22 A. The FedEx Retirement Service Center
23 is Mercer.

24 Q. Oh, it is?

1 A. Yes. It's a specific group within
2 Mercer.

3 Q. I apologize. I'm a little bit
4 confused. So Mercer -- is Mercer the company
5 owned by FedEx?

6 A. No.

7 Q. Okay. That's a separate entity?

8 A. Yes.

9 Q. And you testified earlier it's an
10 actuarial firm?

11 A. That's correct.

12 Q. But -- and correct me if I'm wrong --
13 I guess FedEx has so many employees that Mercer
14 has dedicated a division or a work group or
15 something?

16 A. That is true. They dedicated a work
17 group.

18 Q. Okay. All right. And the reason I
19 say that is when I've called -- in the plan
20 documents, when I've called the numbers to try
21 to ascertain addresses, it gets confusing
22 because I'll call, for example, Aon Hewitt and
23 they'll refer me to the FedEx Retirement
24 Services Center.

1 A. We have a FedEx Retirement Service
2 Center at Aon Hewitt now, as well.

3 Q. Yeah. Okay. So that's the
4 connection.

5 A. (Witness nods head affirmatively.)

6 Q. Are these individuals at the FedEx
7 Retirement Services Center, for example, and
8 Aon Hewitt -- I'm just talking about the people
9 who do the calculations.

10 A. Uh-huh (affirmative response).

11 Q. Are those FedEx employees or Aon
12 Hewitt employees?

13 A. They are not FedEx employees. They
14 are either Mercer or Aon Hewitt employees.

15 Q. Okay. Do you know the specific
16 addresses to where -- physically where Mercer
17 and where Aon Hewitt is located?

18 MR. KNOX: Joe, I don't mean to
19 interrupt, but what topic are we under
20 here? Because it sounds like we're
21 getting away from the topics. I mean, I
22 understand you want the information, and,
23 again, you know, if it fits within a
24 topic, okay. Otherwise, I'm going to

C E R T I F I C A T E

STATE OF TENNESSEE:

COUNTY OF MADISON:

I, TAMMY W. WENDEL, LCR, and Notary
Public, Madison County, Tennessee, CERTIFY:

The foregoing proceedings were taken before me at the time and place stated in the foregoing styled cause with the appearances as noted.

Being a Court Reporter, I then reported the proceeding in Stenotype, and the foregoing pages contain a true and correct transcript of my said Stenotype notes then and there taken.

I am not in the employ of and am not related to any of the parties or their counsel, and I have no interest in the matter involved.

I further certify that in order for this document to be considered a true and correct copy, it must bear my original signature and that any reproduction in whole or in part of this document is not authorized and not to be considered authentic. Unauthorized reproduction and/or transfer will be in violation of Tennessee Code Annotated 39-14-149, Theft of Services.

Witness my signature this the _____
day of _____, 2015.

TAMMY W. WENDELL, LCR

Notary Public at Large
For the State of Tennessee
My Commission Expires:
February 24, 2016